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Attorney for Plaintiff Yvonne Peychal

[Additional Attorneys Listed on Signature Page]

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Mirlinda Elmazi, on behalf of herself and all others
similarly situated,

Plaintiff,

v.

DSM-FIRMENICH AG, FIRMENICH
INTERNATIONAL SA, FIRMENICH INC.,
AGILEX FLAVORS & FRAGRANCES, INC.,
GIVAUDAN SA, GIVAUDAN FRAGRANCES
CORP., GIVAUDAN FLAVORS CORP.,
UNGERER & COMPANY, INC., CUSTOM
ESSENCE INC., INTERNATIONAL FLAVORS &
FRAGRANCES INC., SYMRISE AG, SYMRISE
INC., AND SYMRISE US LLC,

Defendants.

Yvonne Peychal, on behalf of herself and all others
similarly situated,

Plaintiff,

v.

DSM-FIRMENICH AG, FIRMENICH
INTERNATIONAL SA, FIRMENICH INC.,
AGILEX FLAVORS & FRAGRANCES, INC.,
GIVAUDAN SA, GIVAUDAN FRAGRANCES
CORP., GIVAUDAN FLAVORS CORP.,
UNGERER & COMPANY, INC., CUSTOM
ESSENCE INC., INTERNATIONAL FLAVORS &
FRAGRANCES INC., SYMRISE AG, SYMRISE
INC., AND SYMRISE US LLC,

Defendants.

CIVIL ACTION NO: 23-CV-16127

**PLAINTIFFS' MOTION TO
CONSOLIDATE RELATED CASES
PURSUANT TO FED.R.CIV.P. 42(A)
AND APPOINT INTERIM CO-
LEAD COUNSEL PURSUANT TO
FED.R.CIV.P. 23(G)**

Date:
Time:
Place:
Judge:

CIVIL ACTION NO: 23-CV-16242

Related Action

PLEASE TAKE NOTICE that on October 7, 2023 at 9:00 a.m., or as soon thereafter as counsel may be heard, End-User Plaintiffs Mirlinda Elmazi and Yvonne Peychal, individually and on behalf of all others similarly situated, will move at the United State District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an order consolidating related cases pursuant to Fed. R. Civ. P. 42(a) and appointing Interim Co-Lead Counsel and Liaison Counsel pursuant to Fed. R. Civ. P. 23(g) and granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of this motion, End-User Purchaser Plaintiffs Mirlinda Elmazi and Yvonne Peychal will rely on the accompanying Briefs and Declarations of Kellie Lerner. A proposed form of Order is also submitted herewith.

Dated: September 6, 2023

By: /s/ Kellie C. Lerner

Kellie C. Lerner

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William V. Reiss (filing *pro hac* shortly)

Benjamin D. Steinberg (filing *pro hac* shortly)

Ellen G. Jalkut (filing *pro hac* shortly)

Jordan B. Finkel (filing *pro hac* shortly)

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By: /s/ Kimberly A. Justice

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